



*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 7, 2022

**VIA ECF**

The Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Sung Kook (Bill) Hwang, et al.*,  
22 Cr. 240 (AKH)**

Dear Judge Hellerstein:

The Government respectfully writes in advance of the September 8, 2022, conference to inform the Court that the parties have conferred about a proposed motion schedule in this matter. Based on conversations and correspondence between the parties, the Government understands the following briefing schedule would be acceptable to all parties:

- Defense motion papers to be filed no later than December 2, 2022;
- Government opposition briefs to be filed no later than January 12, 2023; and
- Defense replies to be filed no later than February 2, 2023.

At tomorrow's conference, the Government will respectfully request that the Court adopt the parties' proposed motion briefing schedule.

In addition, the Government tomorrow will respectfully request that the Court set a trial date. Because a trial in this matter may last approximately two months, setting a trial date now would allow all parties to immediately arrange for the availability of trial teams, experts, and witnesses; permit the Court to reserve the time in its own schedule; and enable the public and the

parties to avoid unnecessary delay in obtaining a jury's verdict in this matter. The Government understands that the defendants oppose the setting of any trial date until the Court resolves the motions the defense intends to file.

Respectfully submitted,

DAMIAN WILLIAMS  
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